

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

| | | |
|-------------------------|---|--------------------------|
| In re: |) | Case No. 25-30002 |
| |) | (Chapter 11) |
| GENERATIONS ON 1ST, LLC |) | |
| |) | |
| Debtor |) | |
| |) | |
| |) | |
| In re: |) | Case No. 25-30003 |
| |) | (Chapter 11) |
| PARKSIDE PLACE, LLC |) | |
| |) | Jointly Administered |
| Debtor |) | |
| |) | |
| |) | |
| In re: |) | Case No. 25-30004 |
| |) | |
| THE RUINS, LLC |) | |
| |) | |
| Debtor |) | Not Jointly Administered |
| |) | |

MOTION TO CONTINUE HEARINGS

Come now Generations on 1st, LLC (“Generations”) Parkside Place, LLC (“Parkside”), and The Ruins, LLC (“Ruins”) (collectively, the “Debtors,” and each a “Debtor”), by and through undersigned counsel, pursuant to Local Rule 5071-1, and move to continue the hearings on (i) Red River State Bank’s motion to convert Ruins’ case to chapter 7; (ii) Red River State Bank’s notice of alleged default on cash collateral terms in the Generations and Parkside matters; and (iii) Red River State Bank’s motion to terminate exclusivity in the Generations and Parkside matters, to Monday, November 3, 2025 and Tuesday, November 4, 2025, and in support thereof state as follows:

As previously shared, Jesse Craig (“Mr. Craig”)—the principal and sole member of all three Debtors—entered an emergency room in or about Billings, Montana, over this preceding

weekend, complaining of nerve and other bodily pain. Following various medical appointments, and a trip back to Fargo, North Dakota, Mr. Craig proceeded to undergo emergency surgery yesterday (October 23, 2025), with vertebrae being removed, fused, and rebuilt. A copy of pre-surgical doctor's notes, redacted to shield certain personally identifiable information, is appended hereto as Exhibit A.¹

Mr. Craig's wife, Mulinda Craig, informs that prior to surgery, Mr. Craig was taking Oxycodone and hydromorphone. A review of internet materials suggests at least one of the prescriptions being taken to be of an opioid variety.

While Mr. Craig's recovery is likely to take some time, there is an abiding hope that he will be of a mental state sufficient to meaningfully both testify and assist counsel at a hearing on the proposed continued dates (which mirror the "backup" dates established during a previous hearing continuing the subject matters). There is some skepticism, however, that he will be able to do so on the currently-scheduled hearing dates of October 27 and 28, 2025.

Consistent with the rigors of Local Rule 5071-1, a phone call was placed to Caren Stanley, counsel for Red River State Bank, prior to the filing of this motion, and a video call was then had—largely for purposes of addressing evidentiary stipulations but also for purposes of discussing a proposed continuance—with Ms. Stanley, Kesha Tanabe, and Drew Hushka, also prior to the filing of this motion. Additionally, an e-mail was sent to the courtroom deputy, copying counsel for all parties having appeared herein, prior to the filing of this motion.

WHEREFORE, the Debtors respectfully pray the indicated hearings be continued to November 3 and 4, 2025, and for such other and further relief as may be just and proper.

¹ Undersigned counsel is not entirely certain as to the meaning of "MRN" and has redacted this number accordingly, in an abundance of caution. It is possible this redaction is unnecessary. An original, unredacted version exists in counsel's file.

Respectfully Submitted,

Dated: October 24, 2025

By: /s/ Maurice B. VerStandig
Maurice B. VerStandig, Esq.
The Dakota Bankruptcy Firm
1630 1st Avenue N
Suite B PMB 24
Fargo, North Dakota 58102-4246
Phone: (701) 394-3215
mac@dakotabankruptcy.com
Counsel for the Debtors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of October, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig
Maurice B. VerStandig